

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

DATA COLLECTIVE II, L.P., DCVC  
OPPORTUNITY FUND, L.P., and DCVC  
MANAGEMENT CO, LLC,

Petitioners,

v.

BARON CAPITAL MANAGEMENT INC.,

Respondent.

Misc. Case No. 25-mc-57

Related to Civil Action No. 5:21-cv-06028-  
PCP, pending in the United States District  
Court for the Northern District of California

**PETITIONERS' NOTICE OF MOTION TO COMPEL**

**PLEASE TAKE NOTICE** that upon the annexed Declaration of Zaneta J. Kim, dated February 7, 2025, and the exhibits attached thereto; the accompanying Memorandum of Law, dated February 7, 2025, the undersigned will move this Court on behalf of Petitioners Data Collective II, L.P., DCVC Opportunity Fund, L.P., and DCVC Management Co, LLC, at the United States Courthouse for the Southern District of New York, located at 500 Pearl Street, New York, New York, at a time set by the Court, for an order, pursuant to Rule 45 of the Federal Rules of Civil Procedure, to compel Respondent Baron Capital Management Inc. to complete its production of documents and appear for a deposition.

Dated: February 7, 2025

Respectfully submitted,

GIBSON, DUNN & CRUTCHER LLP

/s/ Mary Beth Maloney

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*Attorney for Petitioners Data Collective II, L.P.,  
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Management Co, LLC*